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February 3, 2000

VIA E-MAIL W/MAIL CONFIRMATION

Mary Cottrell, Secretary
Massachusetts Department of
Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: Choice One Communications of Massachusetts Inc.
DTE Docket 99-99 – Number Pooling

Dear Secretary Cottrell:

Choice One Communications of Massachusetts Inc. ("Choice One"), pursuant to the DEPARTMENT CALL FOR COMMENTS RELATIVE TO PROPOSAL BY BELL ATLANTIC ("Proposal") issued January 26, 2000 in the above-referenced proceeding, respectfully submits its comments to the Proposal.

Choice One has commenced commercial service in the 508 NPA. The lack of numbers in the 508 NPA severely hampers Choice One's competitiveness in the Worcester market. Although Choice One has some assigned NXXs codes in the Worcester market, it does not have NXXs code in each rate center in which it provides service. In those areas in which it has no NXX codes, it is able to market its service to customers who wish to migrate from another service provider's service because of the availability of local number portability. However, it is unable to offer such customers' additional voice services through the use of additional lines or market services to customers establishing new service in certain segments of the Worcester area. Thus, the lack of sufficient NXX codes in the 508 NPA constrains the ability of Choice One to compete with incumbent carriers in this area. The implementation of number pooling will be beneficial to Choice One and other new entrants providing local exchange service in the Worcester area and increase the benefits of local competition as contemplated by the Telecommunications Act of 1996 in this area.

Consequently, Choice One urges the Department to implement number pooling as soon as

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practicable. To this end, the time line proposed by Bell Atlantic for Phases I and II appear reasonable to Choice One. Based on Choice One's experience in the implementation of number pooling in the 716 NPA, there is a need between the date on which the mandatory donation date is ordered and such donation date to allow participating carriers to make necessary network changes and modify internal procedures to provide for thousand number pool administration.

Although the donation of "contaminated" blocks (i.e., blocks that have assigned telephone numbers, but 10% or less have been assigned) imposes additional obligations on a participating carrier, Choice One is reluctant to support the Phase III date proposed by Bell Atlantic because it may deprive the number pool of the use of such numbers for almost one year after the implementation date. Choice One submits that the date of when "contaminated" blocks should be donated should be determined based on whether or when additional number resources may be required to meet forecasted needs. Once the pooling administrator has obtained the forecast and block donation identification reports, the Department and industry will be able to determine if the vacant blocks donated will satisfy the forecasted needs. If the number of vacant thousand number blocks is not sufficient to provide an adequate inventory or satisfy the forecast requirements for the pool, an earlier date may be required for donation of the "contaminated" block.

For example, in the New York's 716 NPA number pool trial, the participants in the trial are required to identify and donate only vacant thousand number blocks. Once the pool administrator has assessed needs to initiate the pool and the blocks have been donated, the timing of possible donation of "contaminated" blocks will then be addressed. Similarly for 508/617 number pools, Choice One submits that no specific date for the Phase III donation should be adopted. The Department would be better advised to indicate that the timing for the Phase III donation will be reviewed mid-June 2000 and a date adopted at that time.

Choice One, therefore, concurs with the dates proposed by Bell Atlantic for Phases I and II to initiate number pooling trials in the 508 and 617 NPAs. Choice One recommends that the Department deny Bell Atlantic's proposed Phase III date and determine the Phase III implementation date once the initial pool has been established.

Sincerely,

Terry J. Romine
Director, Government and Inter-Carrier Relations
and Associate General Counsel
Choice One Communications Inc.

Cc: Service List (via e-mail w/mail confirmation)